

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS EMILY ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY
(PR/USPS-T3-29)**

The United States Postal Service hereby files the responses of witness Emily Rosenberg to the above-listed interrogatory of the Public Representative dated March 13, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-29

Please refer to your testimony on page 21 where you state: "To estimate the cancellation AFCS requirement, Fiscal Year 2010 MODS data were used at the 75th percentile of volume. To estimate the DBCS requirement for the Outgoing Primary (OGP) processing for letters, Fiscal Year 2010 MODS data were used at the 95th percentile...." Please also refer to your response to APWU/USPS-T3-14 where you state: "the 95th percentile...represents the 14/15 highest volume day. There are other mitigating strategies to handle peak days and thus equipment sets are not planned for the highest day of the year."

- a. Please explain the rationale for choosing 75th percentile for AFCS requirement
- b. Please explain the rationale for choosing 95th percentile for DBCS requirement.
- c. Please provide, or refer to the workbook and worksheet containing, data for the daily volumes greater than the 75th percentile for AFCS, and daily volumes greater than the 95th percentile of DBCS.

RESPONSE

(a-b) See USPS-T-3, at 22, lines 1-14.

(c) See USPS Library References N2012-1/71 and NP9.